

PETER L. ARIAN (Bar No. 238029)
(E-Mail: Peterarianlaw@gmail.com)
410 San Anselmo Avenue
San Anselmo, California 94960
Telephone: (415) 758-1871
Facsimile: (415) 329-1408

Attorneys for Defendant
MIGUEL ANGEL SALAS

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

MIGUEL ANGEL SALAS, et al,

Defendants.

Case No. CR-17-283-EMC

**STIPULATION AND PROPOSED
ORDER CONTINUING STATUS
DATE FROM SEPTEMBER 26, 2017
to OCTOBER 18, 2017; PROPOSED
ORDER RE: EXCLUDABLE TIME
UNDER THE SPEEDY TRIAL ACT**

The parties agree and stipulate as follows:

1. Defendants Miguel Salas and Samuel Meza are currently scheduled to appear before the Court for a status conference on September 27, 2017 at 2:30 p.m.
2. Both Messrs. Salas and Meza are on bond and out of custody. (See Dkt. Items 7 and 12.)
3. Defense counsel received an initial round of discovery on June 19, 2017, consisting of approximately 150 bates stamped pages and thirteen audio recordings of varying length.
4. Counsel for Mr. Salas, Peter L. Arian, has been involved in a trial in the matter of *People v. Jerry Coneal III*, San Mateo County Case SC080432A. Trial in Mr. Coneal's case commenced on July 10, 2017, and ended on August 31, 2017.

1 Subsequent to the trial, counsel for Mr. Salas has engaged in settlement negotiations
2 with the government, but have yet to reach a disposition of the matter. Settlement
3 negotiations are on-going and appear to be fruitful. Counsel for the government and
4 Messrs. Salas and Meza are jointly requesting additional time to negotiate a disposition
5 in the case.

6 5. All parties are available on October 18, 2017 at 2:30 p.m to appear before
7 the Court, and respectfully request that the matter be continued to that date.

8 6. The parties agree that an exclusion of time is appropriate under the Speedy
9 Trial Act between September 27, 2017 and October 18, 2017, for the purposes of the
10 effective preparation of counsel. The parties also agree that the ends of justice served
11 by granting such a continuance outweigh the best interests of the public and the
12 defendant in a speedy trial. (18 U.S.C. § 3161(h)(7)(A).

13 Respectfully submitted,

14
15 DATED: September 26, 2017 By /s/ Peter L. Arian

16 PETER L. ARIAN
17 Attorney for MIGUEL SALAS

18 DATED: September 26, 2017 By /s/ Geoffrey A. Hansen

19 GEOFFREY A. HANSEN
20 Assistant Federal Public Defender
21 Attorney for SAMUEL MEZA

22 DATED: September 26, 2017 By /s/ Nikhil Bhagat

23 NIKHIL BHAGAT
24 Assistant United States Attorney
25 Attorney for the United States
26
27
28

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**[PROPOSED] ORDER
CONTINUING STATUS DATE
FROM SEPTEMBER 27, 2017 to
OCTOBER 18, 2017 AND
PROPOSED ORDER RE:
EXCLUDABLE TIME UNDER THE
SPEEDY TRIAL ACT**

Pursuant to the parties' stipulation, the Court orders that the status conference currently set for September 27, 2017 be continued to October 18, 2017. The Court also finds that the exclusion of the period from September 27, 2017 to October 18, 2017 from the time limits applicable under 18 U.S.C. § 3161 is warranted; that the ends of justice served by the continuance outweigh the interests of the public and the defendant in the prompt disposition of this criminal case; and that the failure to grant the requested exclusion of time would deny counsel for the defendant and for the government the reasonable time necessary for effective preparation and of counsel, taking into account the exercise of due diligence, and would result in a miscarriage of justice. See 18 U.S.C. § 3161(h)(7)(B)(iv).

DATED: September 26, 2017

